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November 10, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

The conference scheduled
for 1/24/24 is canceled.
So ordered.
11/13/23 JGK/Koeltl
U.S.D.S.

Re: *Southgate v. PureCycle Technologies, Inc. et al.*, Case No. 1:23-CV-08605-JGK

Dear Judge Koeltl:

I represent Plaintiff Jay Southgate ("Plaintiff") in the above-referenced action. In accordance with Rule 1.E. of Your Honor's Individual Practices, I write to respectfully request adjournment of the initial pretrial conference, currently scheduled for January 24, 2024, at 3:00 p.m.

This is a securities class action alleging claims pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 *et seq.* (the "PSLRA"). ECF No. 1. The PSLRA provides the procedure to appoint a lead plaintiff and lead counsel, 15 U.S.C. § 78u-4(a)(3), and requires that "discovery and other proceedings are staying during the pendency of any a motion to dismiss," 15 U.S.C. § 78u-4(a)(3)(B). In accordance with the PSLRA, the deadline for any putative class member to move for appointment as lead plaintiff is November 28, 2023.

Due to the lead plaintiff process, Plaintiff and Defendants PureCycle Technologies, Inc., Dustin Olson, and Lawrence Somma ("Defendants") have agreed, among other things, that once the Court appoints a lead plaintiff, the Court-appointed lead plaintiff and counsel for those Defendants shall confer and submit a proposed schedule for the filing of an amended complaint and a motion to dismiss briefing schedule, as provided in the stipulation filed concurrently herewith. Accordingly, in light of the discovery stay, I request that the initial pretrial conference in this action, currently scheduled for January 24, 2024, and any associated deadlines, be adjourned until after the resolution of the anticipated motion(s) to dismiss.

There have been no prior requests for adjournment or extension. Counsel for Defendants consent to the request.

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We appreciate the Court's consideration of this request and are available at the Court's convenience should Your Honor have any questions.

Respectfully,

s/ Gregory B. Linkh

Gregory B. Linkh

cc: All counsel of record (via ECF)